

1 GLYNN, FINLEY, MORTL,
HANLON & FRIEDENBERG, LLP
2 ADAM FRIEDENBERG, Bar No. 205778
ADAM M. RAPP, Bar No. 280824
3 One Walnut Creek Center
100 Pringle Avenue, Suite 500
4 Walnut Creek, CA 94596
Telephone: (925) 210-2800
5 Facsimile: (925) 945-1975

6 Attorneys for Defendants
VWR International LLC, Avantor, Inc., and
7 Avantor Performance Materials, Inc.

8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10)	Case No. 4:20-cv-00089-HSG
11	EMMANUEL ZARCO,)	
12	Plaintiff,)	DEFENDANTS' ADMINISTRATIVE
13	vs.)	MOTION TO CONTINUE EXPERT
14)	DISCOVERY DEADLINE; ORDER
14	VWR INTERNATIONAL, LLC;)	
15	AVANTOR, INC.; AVANTOR)	
15	PERFORMANCE MATERIALS, INC.; and)	
16	DOES 1 to 25, inclusive)	
16)	
17	Defendants.)	
17	_____)	

18
19 The Court's comments during the recent hearing on Defendants' motion for summary
20 judgment suggested a possibility that the Court may grant the motion in full, which would of
21 course end the case. In the meantime, the parties are confronted with an expert discovery cutoff
22 of May 26, 2021. (Dkt. No. 33.) Defendants have timely noticed the depositions of Plaintiff's
23 expert witnesses on liability and damages for May 12 and 17, respectively. After the summary
24 judgment hearing and consistent with the Court's guidance in its minute order that such a
25 continuance would be acceptable if it did not interfere with pretrial conference dates (Dkt. No.
26 54), counsel for Defendants promptly contacted Plaintiff's counsel to request that the parties
27 stipulate to continue the May 26 deadline to avoid spending time and resources on depositions
28 that may become unnecessary. (Ex. 1.) Plaintiff's counsel advised that he is set for trial in

1 another matter during part of June, so Defendants suggested continuing the deadline to July 31,
2 which would cause no interference with any court-ordered deadline. (*Id.*) Plaintiff has advised
3 that he is not amenable to schedule change, or even any discussion of schedule change, and is
4 unwilling even to explain why this is. (*Id.*) Accordingly, Defendants respectfully request that
5 the Court continue the expert discovery cutoff to July 31, 2021.

6
7 Dated: May 10, 2021

8 GLYNN, FINLEY, MORTL,
9 HANLON & FRIEDENBERG, LLP

10 By /s/ Adam Friedenberg
11 Attorneys for Defendants
12 VWR International LLC, Avantor, Inc.,
13 and Avantor Performance Materials, Inc.

14 **ORDER**

15 DATED: 5/11/2021

